

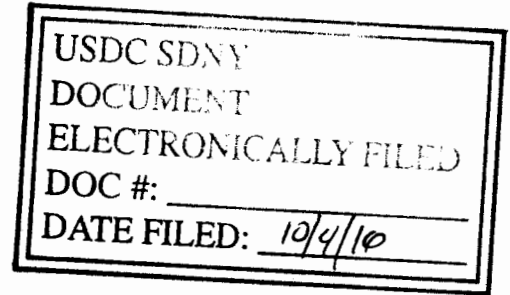
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September 16, 2016

VIA ECF

Hon. Debra C. Freeman
Magistrate Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312



Re: Walter Noel IV v. Laidlaw & Company, Ltd., 16 CV 3975

Dear Judge Freeman:

We represent Plaintiff Walter Noel IV in the above-referenced employment matter. As directed by the Court during the September 14, 2016 Court conference call, we write on behalf of the Parties to submit an updated proposed Case Management Plan, attached hereto. The Parties anticipate that the Court-approved Notice will be sent by mid-October, and the notice period will end around mid-December (60 days later), at which time the Parties will mediate any remaining disputes with a private mediator. If the mediation fails, in light of the need for document discovery, depositions, and expert discovery, the parties request that the Court allow the Parties until March 30, 2017, to complete all discovery.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Walker G. Harman, Jr.

Enclosure

cc: Tania J. Mistretta (via ECF)
Wendy J. Mellk (via ECF)

With the understanding that (a) as additional plaintiffs (if any) opt-in to the collective action, Defendant will produce wage-and-hour records for such plaintiffs, on a rolling basis, and (b) if the parties cannot otherwise reach a negotiated resolution of the action, they will engage in mediation before the end of the year, this Court will, on now, extend the close of discovery to 12/30/16. If the mediation does not result in a settlement, then, within one week of the mediation, counsel should submit to this Court a specific proposal for the completion of any remaining discovery.

SO ORDERED: DATE: 10/4/16

DEBRA FREEMAN

UNITED STATES MAGISTRATE JUDGE

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